

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 20-00296-01-CR-W-GAF
)	
EVAN EDWARDS,)	
)	
Defendant.)	

MOTION TO CONTINUE JURY TRIAL

Defendant, Evan Edwards, by and through counsel, Ronna Holloman-Hughes, respectfully moves the Court pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and (B) to remove this case from the Accelerated Joint Criminal Trial Docket scheduled to commence May 3, 2021 and to continue this case until the Accelerated Joint Criminal Trial Docket scheduled to commence September 16, 2021.

SUGGESTIONS IN SUPPORT

In support, Defendant states to the Court:

1. On October 14, 2020, an indictment was filed charging defendant with violations of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B); 18 U.S.C. § 924(c)(1)(A)(i); 18 U.S.C. §§ 922(g)(1), 922(g)(3) and 924(a)(2); and 21 U.S.C. § 844
2. On October 27, 2020, defendant appeared before the Honorable W. Brian Gaddy, United States Magistrate Judge, for an initial appearance and the office of the Federal Defender was appointed to represent defendant.

3. On October 30, 2020, defendant appeared before the Honorable W. Brian Gaddy, United States Magistrate Judge, for an arraignment.
4. On November 18, 2020, defendant appeared before the Honorable W. Brian Gaddy, United States Magistrate Judge, for a detention hearing. Defendant ordered detained.
5. Accelerated Jury Trial has been set for May 3, 2021.
6. Additional time is needed to review the discovery with the client and to investigate the case.
7. This continuance is sought not for purpose of dilatory delay but is sought in truth and fact that the defendant may be afforded due process of law under the Fifth Amendment to the United States Constitution. In accordance with 18 U.S.C. §3161(h)(7)(A) and (B)(iv), it is submitted that the above-stated reasons for a continuance outweigh the best interests of the public and the defendant to a speedy trial, which is required by 18 U.S.C. §3161(c)(1).
8. Defendant, Evan Edwards has been informed of the statutory right to a speedy trial, joins in this request to continue, and does not object to the tolling of speedy trial time during the requested period.
9. Assistant United States Attorney, Trey Alford, has no objection to this request.
10. Under the provisions of 18 U.S.C. §3161(h)(7)(A) the period of time until the next criminal trial docket should be excluded in computing the period of time in which the defendant should be brought to trial under the provisions of the

Speedy Trial Act.

WHEREFORE, Defendant respectfully requests that the Court remove this case from the Accelerated Joint Criminal Trial Docket scheduled to commence May 3, 2021 and to continue this case until the Accelerated Joint Criminal Trial Docket scheduled to commence September 16, 2021.

Respectfully submitted,

/s/Ronna Holloman-Hughes
Ronna Holloman-Hughes
Assistant Federal Public Defender
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Kansas City, MO 64106
(816) 471-8282

CERTIFICATE OF SERVICE

In accordance with Rule 49(a), (b) and (d), Fed. R. Crim. P., and Rule 5(b), Fed. R. Civ. P., it is hereby CERTIFIED that on March 22, 2021, one copy of the foregoing motion was electronically delivered to all participants of the ECF filing system.

/s/ RONNA HOLLOMAN-HUGHES
Ronna Holloman-Hughes